

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Implementation of the Subscriber Carrier)	CC Docket No. 94-129
Selection Changes Provisions of the)	
Telecommunications Act of 1996)	
)	DOCKET FILE COPY ORIGINAL
Policies and Rules Concerning)	
Unauthorized Changes of Consumers)	
Long Distance Carriers)	
)	
Joint Petition for Waiver)	DA 99-683
)	
Joint Motion for Extension of Effective Date of)	
Rules or, in the Alternative, for a Stay)	

REPLY COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation and its affiliated domestic companies (collectively "GTE")¹ hereby respectfully submit replies to the initial comments on the Joint Petition for Waiver ("Joint Petition") and Joint Motion for Extension of Effective Date of Rules or, in the Alternative, for a Stay ("Joint Motion") filed in the above-captioned proceeding by MCI Worldcom, AT&T Corp., the Competitive Telecommunications Association, Sprint

¹ GTE's domestic companies are: GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., Contel of the South, Inc., GTE Wireless Incorporated, GTE Communications Corporation and GTE Long Distance.

Corporation, the Telecommunications Resellers Association, Excel Telecommunications, Frontier Corporation, and Qwest Communications Corporation ("Joint Petitioners").²

In its initial comments, GTE stated that it supports the Joint Petitioners' efforts to develop a third party administrator ("TPA") system. However, GTE commented that the TPA proposal raised a number of issues that must be resolved prior to implementing any TPA plan.

Along with other representatives from the local exchange carrier industry, GTE met with the Joint Petitioners on April 20, 1999 to gain a better understanding of the TPA proposal. While this session helped to clarify the positions of all carriers, additional meetings are necessary if there is to be wide-scale agreement on the details of the TPA proposal. Such additional meetings are already planned to pursue this objective.

It is GTE's hope that through these meetings, the industry can resolve the issues GTE previously raised in its comments. These include:

- Initial and continuing cost of the TPA;
- How the proposed TPA would be funded;
- The operational impacts of implementing the TPA;
- The impact on billing systems and practices;

² See *Public Notice*, Common Carrier Bureau Announces Deadline for Filing Comments on MCI WorldCom's Joint Petition for Waiver of Slamming Liability Rules and Third Party Administrator Proposal CC Docket No. 94-129, DA 99-683 (released April 8, 1999).

- How the neutrality of the TPA can be assured; and
- The handling of clearinghouse functions.

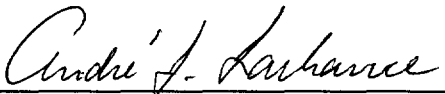
To permit this dialog take place, GTE urges the FCC to grant the Joint Petitioners' motion for extension (or stay) of the effective date of the slamming rules.

Dated: April 26, 1999

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic companies


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CERTIFICATE OF SERVICE

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE Service Corporation" have been mailed by first class United States mail, postage prepaid, on April 26, 1999 to the parties on the enclosed list.



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